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Subject: Proceeding no. 20-230

With regard to the applicability of mandatory copy-restriction measures and "digital rights management" implementations in digital media transmissions, I would like to register my opposition to this measure.

High definition systems should offer the same consumer benefits that current analog broadcast methods do- there is a significant user expectation of the ability to time-shift and space-shift recordings, which has indirectly benefitted producers of programming even if they refuse to recognize it.

Time-shifting allows individuals to enjoy programming that is normally outside their schedule. We Americans are busy people, and some of us just don't live on a prime time schedule. So, we use recording systems such as the tried and true VCR or the modern TiVo to see these programs otherwise denied us by our work and social lives. What is the rationale for denying individuals the ability to watch shows and sporting events when they otherwise could not have?

Furthermore, medium-based schemes are inherently flawed- especially one which relies on a broadcast medium, in which there is no feedback to guarantee operation. Even beyond any legal objections, from an engineering perspective this is not feasible.

All in all, this measure appears to be an ill-considered giveaway to entities that would like nothing more than to shoot themselves in the foot. They're free to do that- but not on the government's dime, and I'd rather we not waste our time fiddling around- we've wasted enough time implementing digital TV already.

Sincerely,

Byron Himberger